REMARKS

In the Office Action, the Examiner rejected Claims 1-15, which were all of the then pending claims, under both 35 U.S.C. 103 and 112. Specifically, the claims were rejected under 35 U.S.C. 103 as being unpatentable over U.S. patent application publication no. 2005/0125195 (Brendel) in view of U.S. patent application publication no. 2003/0037136 (Lebovitz). The claims were further rejected under 35 U.S.C. 112 as failing to comply with the enablement requirement. The Examiner also objected to informalities in Claims 10 and 14.

The rejections of the claims under both 35 U.S.C. 103 and 112 are respectfully traversed. New Claims 16 and 17, which are dependent from Claim 1, are being added to describe preferred features of the invention.

Also, the informalities that the Examiner noted in Claims 10 and 14 are being corrected, and this opportunity is being taken to correct an informality in the specification. In particular, Claim 10 is being amended to be dependent from Claim 6; the spelling of "predefined" is being corrected in Claim 14; and in the specification, page 4, line 25, the spelling of "to" is being corrected. In view of these changes, the Examiner is respectfully requested to reconsider and to withdraw the objections to Claims 10 and 14.

In addition, for the reasons discussed below, all of Claims 1-15 comply with the enablement requirement of 35 U.S.C. 112 and patentably distinguish over the prior art. The Examiner is, thus, also asked to reconsider and to withdraw the rejections of Claims 1-15 under 35 U.S.C. 103 and 112, and to allow these claims and new Claims 16 and 17.

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The present invention, generally, relates to procedures for providing routers with filters. As discussed in the present application, in order to perform their operations, routers may be provided with filters, which are a set of rules that determine how the routers transmit data. Occasionally, after a network has been designed and implemented and is in use, a filter may be written specifically for the network. These specifically written filters may not be very effective, or may actually have adverse unintended consequences.

The present invention addresses this problem by providing a router with a better, substitute filer for a filter specifically written for the router. More particularly, in the operation of the preferred embodiment of this invention, a set of pre-written standardized filters are provided. Then, when a user or administrator writes a filter specifically for a router in a network, a program is run on a computer to identify one of the pre-written filters as a substitute for the non-standard filter that was specifically written for the router.

That identified substitute filter is loaded onto the router and used instead of the filter that had been specifically written for the router. Preferably, a predefined test is used to identify which one of the pre-written standardized filters most closely matches the filter written specifically for the router.

In rejecting the claims under 35 U.S.C. 112, the Examiner noted that the specification describes the pre-written filters as a substitute for the specifically written filters, and also indicates that the pre-written filter file and the new specific filter file are loaded on the router. The Examiner argued that these two descriptions appear to be contradictory.

In addition, the Examiner argued that the process of matching the pre-written filter files with the specifically written filter files, as claimed in Claims 2, 3, 7, 8 and 12, is not defined in the specification, nor is a pre-defined test for carrying out this process. The

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Examiner further argued that the predefined set of criteria in Claims 4, 9 and 14, and the searching feature recited in Claims 5, 10 and 15 are not supported in the specification.

With respect to the first of these point – the apparent contradictory descriptions in the specification – Applicant wishes to note that with the preferred embodiment of the invention, both the specifically written filter and the matching pre-written filter are loaded onto the router. However, the pre-written filter is used by the router as a substitute for that specifically written filter. In the practice of this embodiment of the invention, the specifically written filer is loaded onto the router but not necessarily used. The filter, though, is available on the router for use if an administrator wishes to use the specifically written filter.

In view of the above-discussion, the two passages of the specification referred by the Examiner are not contradictory, and both of these passages are consistent with the preferred implementation of the invention.

Also, as explained in the specification, for example, on page 5, lines 5-10, any suitable criteria and process may be used to identify which one of the pre-written filters most closely matches the specifically written filter. Those of ordinary skill in the art would be readily able to provide suitable criteria and processes to determine a matching filter. With regard to this issue, it may be helpful to note that what is important is not how the match is made, but that a match is made. The specific criteria, test or procedure used to do that is not critical. Any suitable process may be used to do that, and those of ordinary skill in the art would be able to develop a procedure, within the scope of the present invention, to find an appropriate match.

Analogous arguments apply with respect to the predefined criteria recited in Claims 4, 9 and 14, and the defined features recited in Claims 5, 10 and 15. What is important is not specifically what criteria or features are used, but that some defined suitable criteria and

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features <u>be</u> used. The present invention does not require the selection of any specific set of criteria or features, and the criteria and features do not have to be chosen to optimize the performance of the invention. Instead, any suitable criteria and features may be used.

The invention, as defined by Claims 4, 9 and 14, only requires that some predefined criteria be used, and Claims 5, 10 and 15 only require that some suitable features be defined. In the practice of the invention, those criteria and defined features can be chosen by a user, and those of ordinary skill in the art would be readily able to select suitable criteria and features so as to find "a best match," as determined by the user, between the specifically written filer and one of the pre-written filters.

In light of the above-discussion, those of ordinary skill in the art would be able to practice the subject matter defined by each of Claims 1-15. Thus, the specification fully enables those claims, within the meaning of 35 U.S.C. 112. The Examiner is, consequently, respectfully requested to reconsider and to withdraw the rejection of Claims 1-15 under 35 U.S.C. 112.

The rejection of the claims under 35 U.S.C. 103 is respectfully traversed because Brendel is not prior art as to this application. This is because the earliest possible effective date of Brendel as a reference is December 23, 2002, and this is <u>after</u> the filing date, January 9, 2002, of the present application. Thus, Brendel does not qualify as prior art under 35 U.S.C. 102(e), or any other subsection of 35 U.S.C. 102, and because of this, this reference cannot be applied under 35 U.S.C. 103
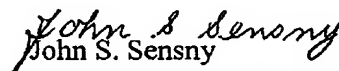
Brendel is relied on by the Examiner to reject each of Claims 1-15 under 35 U.S.C 103. Since Brendel is not prior art, this rejection of the claims should be withdrawn.

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The other references of record have been reviewed, and the pending claims also patentably distinguish over these other references. In particular, the prior art does not disclose or suggest the procedure for identifying and using a pre-written filter as a substitute for a specifically written filter, as described in independent Claims 1, 6 and 11. Claims 2-5, 16 and 17 are dependent from, and are allowable with, Claim 1. Similarly, Claims 7-10 are dependent from Claim 6 and are allowable therewith; and Claims 12-15 are dependent from, and are allowable with, Claim 11.

The Examiner is, accordingly, also asked to reconsider and to withdraw the rejection of Claims 1-15 under 35 U.S.C. 103, and to allow these claims and new Claims 16 and 17.

For the reasons advanced above, the Examiner is requested to reconsider and to withdraw the objections to Claims 10 and 14 and the rejections of Claims 1-15 under 35 U.S.C. 103 and 112, and to allow Claims 1-17. If the Examiner believes that a telephone conference with Applicant's Attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned.

Respectfully Submitted,

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